



U.S. Department
of Transportation
**Federal Aviation
Administration**

SEP 14 2015

FEDEX Overnight Delivery

Mr. Richard McCoy, P.E.
Air National Guard Bureau/A70R
3501 Fetchet Avenue
Joint Base Andrews, Maryland 20762-5157

Dear Mr. McCoy,

Re: FAA Comments on Draft Work Plan for the
Regional Compliance Restoration Program
Preliminary Assessment/Site Inspection

The Federal Aviation Administration (FAA) William J. Hughes Technical Center (Technical Center) has reviewed the August 2015 Draft Work Plan for the Regional Compliance Restoration Program Preliminary Assessment/Site Inspection.

Below are the FAA's comments:

1. In a letter dated August 27, 2015, the U.S. Environmental Protection Agency (EPA) stated that the William J. Hughes Technical Center (Technical Center) is a "...Listed National Priorities Site and subject to the Comprehensive Environmental Response Compensation and Liability Act ("CERCLA") for the cleanup of hazardous substances located on its facility." Accordingly, the FAA understands this site investigation must comply with the CERCLA process, the Federal Facilities Agreement (FFA) between the FAA and EPA, and the EPA will be afforded the opportunity to review the referenced work plan.
2. Based on the limited amount and type of samples that will be collected, please clarify in the report whether or not this is a focused Site Investigation (SI) approach or a single SI approach.
3. Section 1.1: Consider adding a statement that states that samples will be collected to support a site evaluation pursuant to the Hazard Ranking System (HRS).
4. Section 1.1: HRS Guidance Manual (HRSGM) (OSWER Directive 9345.1-07) should be added to the list of references.
5. Section 1.9: Please clarify if figures and field sampling data sheets will be provided as an Appendix.
6. Section 1.9, Appendix E: Please clarify if HRS stands for Hazard Ranking System. Also, HRS is not in the list of acronyms and abbreviations.

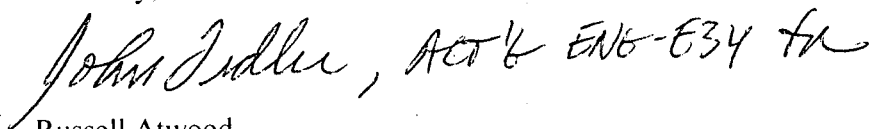
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7. Section 4: Consider adding a statement to the introduction explaining how the assessment of the four pathways will aid in calculating the HRS score.
8. 4.1: The last sentence in the paragraph seems to be out of place, and not consistent with the HRS GM.
9. Figure 5.1, Areas of Concern (AOCs) TU001: Please explain why borings are located in areas where non-native backfill will most likely be encountered.
10. SOP 11: The EPA's low stress purging and sampling procedure should be referenced. The EPA has stated in historical correspondences that low stress purging and sampling is the preferred procedure instead of volume based purging and sampling.
11. Section 6.1: Please elaborate on whether or not the sludge and debris removal action will comply with the Off-Site Rule (40 CFR 300.440). Please clarify if the New Jersey Air National Guard (NJANG) considers the sump in Building 242 an AOC.
12. Section 6.3: Please note that the FAA has its own internal mark out procedures, and the FAA should be contacted before work commences.
13. Appendix B, Quality Assurance Project Plan (QAPP) Worksheet #14: The QAPP states that field and laboratory data will be entered into Environmental Resources Program Management System (ERPIMS). The FAA respectfully requests all sample data, submitted in FAA EQUIS format, for inclusion into FAA's environmental database. Most likely the laboratory will already have this capability.
14. Appendix E: It appears that Eurofins Lancaster Labs' NJDEP Laboratory Certificate expired June 3, 2014.

If you have any questions or comments regarding this correspondence, please feel free to contact Thomas Hupf of my staff at (609) 485-5841.

Sincerely,



Russell Atwood
Manager, Facilities Engineering Branch, ANG-E34

Cc: Major Richard Defeo, NJANG 177th Fighter Wing
Michael Waltermire, FAA
William Roach, EPA
Raymond Souweha, NJDEP, BCM